

## REMARKS

Claims 1, 5-8, 10, 11, 14 and 19-21 are pending in the application, with claim 1 being the only independent claim. Dependent claim 12 has been canceled. Independent claim 1 has been amended to incorporate the subject matter of canceled dependent claim 12. Additional support for this amendment may be found, for example, at pg. 7, lines 1-10 and at pg. 12, lines 1-11 of the specification as originally filed. No new matter has been added. Reconsideration of the application, as amended herein and in view of the following remarks, is respectfully requested.

Claims 1, 5-8, 10-12, 14 and 19-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over WO 00/50693 (“*Jokinen*”) in view of U.S. Patent No. 6,740,204 (“*Kahl*”) and U.S. Patent No. 6,592,721 (“*Anderson*”). For the following reasons, reconsideration and withdrawal of this rejection are respectfully requested.

Independent claim 1 has been amended to include the subject matter of now canceled claim 12. Amended claim 1 now recites, *inter alia*, the following:

“wherein upon depressurization of the bellows such that the bellows contracts, the sealing element is adjusted away from the fabric by gravitational forces, and upon pressurization such that the bellows expands, the sealing element becomes adjusted nearer to the fabric by the bellows”.

Additional support for this limitation may be found, for example, at pg. 7, lines 1-10 and at pg. 12, lines 1-11 of the specification as originally filed. No new matter has been added.

Applicants respectfully submit that amended claim 1 is patentable over *Jokinen* in view of *Kahl* and *Anderson* because the combination of *Jokinen*, *Kahl* and *Anderson* fails to teach or suggest the above-quoted limitation of amended claim 1. In particular, the combination of *Jokinen*, *Kahl* and *Anderson* fails to teach or suggest using a bellows or gravitational forces to adjust the location of a sealing element relative to a fabric based on pressurization and depressurization of the bellows.

On page 4 of the Office Action, the Examiner acknowledges that *Jokinen* and *Kahl* fails to teach or suggest a pressure loading element that is a bellows. *Anderson* has been cited to provide this feature. However, the combination of *Jokinen*, *Kahl* and *Anderson* fails to teach or suggest using a bellows or gravitational forces to adjust the location of a sealing element relative to a fabric based on pressurization and depressurization of the bellows. That is, *Jokinen*, *Kahl* and *Anderson*, individually or in combination, fail to teach or suggest the limitation “upon depressurization of the bellows such that the bellows contracts, the sealing element is adjusted away from the fabric by gravitational forces, and upon pressurization such that the bellows expands, the sealing element becomes adjusted nearer to the fabric by the bellows”, as now expressly recited in amended claim 1.

*Anderson* (col. 5, lines 17-19; FIG. 3) teaches an internal blowbox 30 that is arranged at a lower position of a bottom suction press roll. *Anderson* (col. 5, lines 20-21) describes that “blowboxes are units which direct the flow of air or other gas under pressure”. According to *Anderson*, “[t]he blowboxes used in the preferred embodiments form three-sided compartments located within the suction roll shell and span substantially the entire width of the roll along the roll's cylindrical axis. The blow boxes further comprise seal edges for contacting and sealing the compartment with the roll inner surface. They are pressurized with air so that a radially outward flow of air through the through-holes is created in the region between the seal edges” (see col. 5, lines 21-29).

More particularly, *Anderson* (col. 7, lines 20-22; FIG. 6) teaches that “the blowbox 30 can be biased by springs 65 to place its edges 55 in sealing contact with the inner surface 17 of the moving roll 16”. *Anderson* (col. 7, lines 28-31; FIG. 7) teaches another version of a blowbox that “employs flex tubes 48 between the mounting structure 44 and the blowbox 30 to bias the edges

55 into sealing contact with the inner surface 17 of roll shell 16”. Lastly, *Anderson* (col. 7, lines 33-35; FIG. 7) teaches yet another version of a blowbox that “employs biasing springs 50 with channel/guide flanges 43 as in FIG. 7, but without the tapering surface as in FIG. 6”.

However, each embodiment of the blowbox taught in *Anderson* has nothing to do with Applicants’ disclosed and claimed invention that uses a bellows that contracts upon depressurization such that the sealing element is adjusted away from the fabric by gravitational forces, and that expands upon pressurization such that the sealing element becomes adjusted nearer to the fabric by the bellows.

*Anderson* (col. 2, lines 40-43) explains that the “blowbox is mounted in the inner volume of the suction roll at a circumferential position such that the expelled water will not be thrown back to the ingoing path of the web”. *Anderson* (col. 2, lines 43-46) further explains that the blowbox “can be used as a standalone dewatering unit or in conjunction with an external doctor blade, wipe, or air knife for removing surface water from the roll”. *Anderson* thus teaches a blowbox that is arranged within a suction roll and merely blows air pursuant to dewatering through holes in a suction press roll. The seals of *Anderson* seal against a roll and do not create a seal against a moving fabric. Therefore, the combination of *Jokinen*, *Kahl* and *Anderson* fails to teach or suggest the recitations of amended independent claim 1, because *Anderson* fails to provide what *Jokinen* and *Kahl* lack.

The Examiner (at pg. 5 of the Office Action) asserts that:

The blade is therefore deemed to be arranged so that gravity pulls the blade away from the wire and the pressure effect creates air flow that draws the blade towards the fabric.

Applicants do not agree with this assertion.

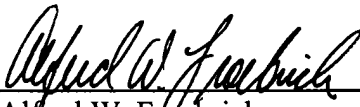
Applicants have disclosed and claimed a stiff sealing element and a bellows that is configured to move the sealing element. The depressurization of the bellows allows gravitational

forces to adjust the claimed sealing element away from the fabric. On the other hand, when the claimed bellows is pressurized, this same bellows causes adjustment of the sealing element nearer to the fabric. Absent impermissible hindsight, based on Applicants' disclosure, the skilled person is provided with no reason whatsoever to modify the teachings of *Jokinen* and *Kahl* based on the teachings of *Anderson* to thereby achieve a bellows that is configured as recited in now amended independent claim 1. Therefore, the combination of *Jokinen*, *Kahl* and *Anderson* fails to teach or suggest using a bellows or gravitational forces to adjust the location of a sealing element relative to a fabric based on pressurization and depressurization of the bellows, as now expressly recited in amended claim 1 of the present application.

In view of the foregoing, withdrawal of the 35 U.S.C. 103(a) rejection of amended independent claim 1 is respectfully requested.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,  
COHEN PONTANI LIEBERMAN & PAVANE LLP

By   
Alfred W. Freebreich  
Reg. No. 38,887  
551 Fifth Avenue, Suite 1210  
New York, New York 10176  
(212) 687-2770

Dated: February 25, 2008